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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	2:10-CR-00370-KJD-GWF
PLAINTIFF,)	
)	
VS.)	<u>MOTION FOR</u>
)	<u>ENLARGEMENT OF BAIL,</u>
ALFRED T. SAPSE, and)	<u>AMENDMENT OF PRETRIAL</u>
RALPH M. CONTI, M.D.)	<u>RELEASE CONDITIONS</u>
)	
DEFENDANTS.)	

Dr. RALPH M. CONTI moves the court for an order enlarging bail and amending his pretrial release conditions to permit him to visit his attorney(s) outside the State of Nevada for purposes of aiding and assisting in the preparation of his defense. General trial counsel practices in Oakland, California, and his senior paralegal and investigator live in Portland, Oregon.

AUSA Crane Pomerantz and Dr. Conti's pretrial release officer have expressed no

objection to this Motion, conditioned on Dr. Conti providing Pretrial Release Services with 24 hours notice of his intent to travel and an itinerary. The Order should reflect those conditions and recite that Dr. Conti is not required to make further application to this court to travel if those conditions are met.

DATED March __, 2012.

Respectfully submitted,


DENNIS ROBERTS
NANCY LORD
Attorneys for Dr. Ralph Conti

/s/ Nancy Lord

Nancy Lord

IT IS SO ORDERED.

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UNITED STATES MAGISTRATE JUDGE
DATE: MARCH 27, 2012